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2 WI Bar 1068086
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5 BURNS BAIR LLP
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10 *Special Insurance Counsel to The Official Committee of Unsecured Creditors*

11 **UNITED STATES BANKRUPTCY COURT**
12 **NORTHERN DISTRICT OF CALIFORNIA**
13 **SAN FRANCISCO DIVISION**

14 In re

15 Case No. 23-30564

16 THE ROMAN CATHOLIC ARCHBISHOP
17 OF SAN FRANCISCO,

18 Chapter 11

19 Debtor and Debtor in Possession.

20 **MONTHLY PROFESSIONAL FEE
21 STATEMENT FOR BURNS BAIR LLP
22 FOR AUGUST 2025**

23 **TO ALL INTERESTED PARTIES AND TO THEIR COUNSEL OF RECORD:**

24 **NOTICE IS HEREBY GIVEN** that Burns Bair LLP, special insurance counsel to the
25 Official Committee of Unsecured Creditors (the “Committee”), hereby files its monthly professional
26 fee statement for the period August 1, 2025 through August 31, 2025 (the “Fee Period”), pursuant
27 to the *Order Establishing Procedures and Authorizing Payment of Professional Fees and Expenses*
28 *on a Monthly Basis* (the “Compensation Order”), entered on October 16, 2023 [ECF No. 212]. The
total fees and expenses incurred by Burns Bair LLP on behalf of the Committee for the Fee Period
are as follows:

Period	Fees	Expenses	Total
August 1, 2025 through August 31, 2025	\$56,671.00	\$0	\$56,671.00
Net Total Allowed Payments this Statement Period (80% of fees and 100% of expenses)	\$45,336.80	\$0	\$45,336.80

Attached hereto at **Exhibit 1** is Burns Bair’s itemized billing statement for its fees and expenses billed during the Fee Period. Pursuant to the Compensation Order, the Net Total Allowed Payments detailed in the chart above shall be paid from funds held by the estate of the Debtor, The

1 Roman Catholic Archbishop of San Francisco, unless an objection is filed with the Clerk of the
2 Court and served upon Burns Bair LLP within *14 days after the date of service* of this monthly
3 professional fee statement.

4 Dated: September 30, 2025

BURNS BAIR LLP

6 By: /s/ Jesse J. Bair
7 Jesse J. Bair

8 *Special Insurance Counsel to the Official
Committee of Unsecured Creditors*

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EXHIBIT 1

Burns | Bair

10 E. Doty St., Suite 600
Madison, Wisconsin 53703-3392
608-286-2302
www.BurnsBair.com

**Official Committee of Unsecured Creditors of
Archbishop of San Francisco**

Issue Date : 9/17/2025
Bill # : 02024

Matter: Insurance

PROFESSIONAL SERVICES RENDERED

Committee Meetings

<u>Date</u>	<u>Timekeeper</u>	<u>Narrative</u>	<u>Hours</u>	<u>Amount</u>
8/1/2025	Brian Cawley	Participate in Committee meeting re case insurance strategy (1.6);	1.60	\$880.00
8/1/2025	Timothy Burns	Present omnibus insurance strategy presentation at full Committee meeting (1.6);	1.60	\$1,792.00
8/4/2025	Brian Cawley	Participate in state court counsel meeting re case insurance issues and negotiations (.6); participate in post-meeting conference with Committee professionals re outcome of same and next-steps (.2);	0.80	\$440.00
8/4/2025	Jesse Bair	Participate in state court counsel meeting for insurance purposes re ongoing negotiations (.6); participate in post-meeting conference with Committee professionals re outcome of same and next-steps (.2);	0.80	\$720.00
8/5/2025	Jesse Bair	Prepare for Committee meeting (.2); participate in Committee meeting for insurance purposes re ongoing negotiations and strategy in connection with same (1.3);	1.50	\$1,350.00
8/5/2025	Jesse Bair	Participate in meeting with the Committee co-chairs re case developments and related strategy (.3);	0.30	\$270.00
8/5/2025	Brian Cawley	Participate in committee meeting for insurance purposes re ongoing negotiations and case strategy (1.3);	1.30	\$715.00
8/5/2025	Brian Cawley	Participate in meeting with the Committee co-chairs re case developments and related strategy (.3);	0.30	\$165.00
8/14/2025	Brian Cawley	Participate in Committee meeting re potential case insurance strategies (1.2);	1.20	\$660.00

8/14/2025	Timothy Burns	Present presentation re potential insurance strategies at Committee meeting (1.2);	1.20	\$1,344.00
8/19/2025	Brian Cawley	Participate in state court counsel meeting re case developments and insurance strategy (1.0);	1.00	\$550.00
8/19/2025	Timothy Burns	Participate in state court counsel meeting re case developments and insurance strategy (1.0);	1.00	\$1,120.00
8/22/2025	Brian Cawley	Participate in state court counsel meeting for insurance purposes re ongoing case negotiations (1.2);	1.20	\$660.00
8/27/2025	Jesse Bair	Participate in state court counsel meeting re Diocese counter and potential response (.5);	0.50	\$450.00
8/27/2025	Timothy Burns	Participate in state court counsel meeting re ongoing negotiations and potential counter response (.5);	0.50	\$560.00
8/28/2025	Brian Cawley	Participate in Committee meeting for insurance purposes re ongoing case negotiations and strategy (1.1);	1.10	\$605.00
8/28/2025	Timothy Burns	Participate in Committee meeting for insurance purposes re ongoing case negotiations and strategy (1.1);	1.10	\$1,232.00
Totals for Committee Meetings			17.00	\$13,513.00

Fee Applications

<u>Date</u>	<u>Timekeeper</u>	<u>Narrative</u>	<u>Hours</u>	<u>Amount</u>
8/19/2025	Jesse Bair	Review and respond to correspondence with Committee professionals re monthly fee statements (.2);	0.20	\$180.00
8/25/2025	Jesse Bair	Correspond with Committee professionals re interim fee hearing and potential adjournment of same (.1);	0.10	\$90.00
Totals for Fee Applications			0.30	\$270.00

Insurance Recovery Activities

<u>Date</u>	<u>Timekeeper</u>	<u>Narrative</u>	<u>Hours</u>	<u>Amount</u>
8/1/2025	Brian Cawley	Revise and finalize insurance strategy presentation for upcoming Committee meeting (.8);	0.80	\$440.00
8/1/2025	Timothy Burns	Prepare for Committee meeting re case insurance strategy and presentation in connection with same (.8);	0.80	\$896.00
8/1/2025	Jesse Bair	Review and respond to correspondence with the mediators re continued insurance discussions and upcoming session (.2);	0.20	\$180.00
8/2/2025	Jesse Bair	Review insurance presentations in preparation for upcoming session (.2);	0.20	\$180.00
8/4/2025	Brian Cawley	Draft mediation summary memo for use in upcoming sessions (1.2);	1.20	\$660.00

8/4/2025	Jesse Bair	Prepare for upcoming mediation session, including detailed review of case insurance presentations, notes of prior sessions, and key case law (1.0); revise carrier claim counts and exposure assessments in connection with same (.2);	1.20	\$1,080.00
8/4/2025	Jesse Bair	Participate in call with B. Michael re mediation strategy and preparations (.5);	0.50	\$450.00
8/4/2025	Jesse Bair	Review and edit draft coverage complaint (.7);	0.70	\$630.00
8/4/2025	Jesse Bair	Review revised PSZJ presentation re ongoing negotiations for upcoming Committee meeting (.2);	0.20	\$180.00
8/4/2025	Brian Cawley	Analyze claim data and draft revised carrier claim count summary (1.3);	1.30	\$715.00
8/5/2025	Jesse Bair	Participate in Zoom mediation session re case insurance issues (1.2);	1.20	\$1,080.00
8/5/2025	Jesse Bair	Participate in call with Committee professionals re outcome of insurance mediation session and projects needed for completion in connection with outcome of same (.4);	0.40	\$360.00
8/5/2025	Brian Cawley	Participate in Zoom mediation session re case insurance issues (1.2);	1.20	\$660.00
8/5/2025	Brian Cawley	Participate in call with Committee professionals re outcome of insurance mediation session and next-steps in connection with outcome of same (.4);	0.40	\$220.00
8/6/2025	Jesse Bair	Revie and edit debtor term sheet for insurance purposes (.8); review and respond to correspondence with PSZJ and the mediators re same (.2);	1.00	\$900.00
8/6/2025	Brian Cawley	Research re excess insurer duty to settle over defending primary insurer (1.8);	1.80	\$990.00
8/6/2025	Brian Cawley	Begin drafting Committee's aggregate insurance demand letter (1.4);	1.40	\$770.00
8/7/2025	Brian Cawley	Continue drafting Committee's aggregate insurance demand letter (2.5);	2.50	\$1,375.00
8/7/2025	Brian Cawley	Additional research re excess insurer bad faith and duty to settle issues (1.1);	1.10	\$605.00
8/7/2025	Karen Dempski	Docket/calendar motion hearing to approve compromise (.1);	0.10	\$34.00
8/8/2025	Jesse Bair	Participate in conference with B. Cawley re ongoing insurance projects and next-steps in light of insurance mediation session (.2);	0.20	\$180.00
8/8/2025	Brian Cawley	Participate in conference with J. Bair re case insurance projects and next-steps in light of insurance mediation session (.2);	0.20	\$110.00
8/8/2025	Brian Cawley	Finish drafting Committee aggregate insurance demand letter (2.9);	2.90	\$1,595.00
8/9/2025	Jesse Bair	Review final version of lift stay stipulation, motion in support of same, and related exhibits (.2);	0.20	\$180.00
8/11/2025	Timothy Burns	Conference with B. Michael re mediation and insurance issues (.4);	0.40	\$448.00

8/11/2025	Jesse Bair	Review correspondence with the mediators and debtor re mediation meeting (.1);	0.10	\$90.00
8/11/2025	Brian Cawley	Draft additional presentation re potential insurance strategies for upcoming Committee meeting (3.2);	3.20	\$1,760.00
8/12/2025	Timothy Burns	Review correspondence from state court counsel re case insurance issues and California insurance decision in connection with same (.2);	0.20	\$224.00
8/12/2025	Timothy Burns	Review and respond to correspondence with BB team re Committee insurance presentation (.2);	0.20	\$224.00
8/12/2025	Timothy Burns	Review and revise draft presentation re potential additional insurance strategies for upcoming Committee meeting (.8);	0.80	\$896.00
8/12/2025	Timothy Burns	Review and revise the Committee's aggregate demand letter (.4);	0.40	\$448.00
8/13/2025	Brian Cawley	Draft revised version of insurance strategy presentation to incorporate T. Burns' suggested revisions (1.6);	1.60	\$880.00
8/13/2025	Jesse Bair	Review and edit insurance strategy presentation to the Committee (.1);	0.10	\$90.00
8/14/2025	Timothy Burns	Prepare for Committee meeting re presentation of potential additional case insurance strategies (.6);	0.60	\$672.00
8/14/2025	Timothy Burns	Participate in calls with Committee professionals and state court counsel re outcome of Committee meeting and next-steps re case insurance issues (.6);	0.60	\$672.00
8/15/2025	Timothy Burns	Review and respond to correspondence with B. Michael re conference re case developments (.2);	0.20	\$224.00
8/15/2025	Timothy Burns	Review and respond to correspondence with state court counsel re Howard case (.2);	0.20	\$224.00
8/16/2025	Jesse Bair	Review revised version of insurance strategy presentation to the Committee and related correspondence with Committee professionals re same (.2);	0.20	\$180.00
8/18/2025	Timothy Burns	Participate in call with Committee counsel re case insurance strategy (1.0);	1.00	\$1,120.00
8/18/2025	Timothy Burns	Participate in call with state court counsel re lift stay cases (.3); conference with B. Cawley re same (.2);	0.50	\$560.00
8/18/2025	Brian Cawley	Participate in call with Committee counsel re case insurance strategy (1.0);	1.00	\$550.00
8/18/2025	Brian Cawley	Conference with T. Burns re lift stay cases and related insurance issues (.2);	0.20	\$110.00
8/18/2025	Brian Cawley	Review and respond to T. Burns questions re punitive damage insurance issues (.4);	0.40	\$220.00
8/18/2025	Jesse Bair	Review correspondence with Committee professionals re insurance strategy proposal (.1);	0.10	\$90.00
8/18/2025	Timothy Burns	Participate in call with state court counsel re insurance strategy (.6);	0.60	\$672.00
8/18/2025	Timothy Burns	Review and edit draft demand (.2);	0.20	\$224.00
8/19/2025	Timothy Burns	Participate in Zoom mediation session with debtor re case insurance issues (.4);	0.40	\$448.00

8/19/2025	Timothy Burns	Review and respond to correspondence with Committee professionals re lift stay cases (.2);	0.20	\$224.00
8/19/2025	Jesse Bair	Prepare for insurance mediation Zoom session (.3); participate in insurance mediation Zoom session (.4);	0.70	\$630.00
8/20/2025	Jesse Bair	Prepare for upcoming Committee meeting and mediation session by assessing insurance demand issues and related insurance strategy (.2);	0.20	\$180.00
8/20/2025	Timothy Burns	Assess insurance issues in connection with lift stay cases (.2); participate in call with state court counsel re same (.2); participate in call with B. Michael re same (.1);	0.50	\$560.00
8/20/2025	Timothy Burns	Review and respond to correspondence with B. Michael re upcoming Committee meeting (.2);	0.20	\$224.00
8/20/2025	Brian Cawley	Respond to T. Burns request re insurance issues in connection with lift stay cases (.2);	0.20	\$110.00
8/21/2025	Jesse Bair	Review the insurers' objection to the lift stay motion (.6);	0.60	\$540.00
8/22/2025	Brian Cawley	Draft summary re outcome and key take-aways from state court counsel meeting (.3);	0.30	\$165.00
8/22/2025	Jesse Bair	Review B. Cawley summary and related correspondence re outcome of state counsel meeting (.2); review and respond to correspondence with the mediators re upcoming sessions (.1);	0.30	\$270.00
8/25/2025	Timothy Burns	Participate in calls with state court counsel re insurance strategy re mediation (1.2);	1.20	\$1,344.00
8/25/2025	Timothy Burns	Conference with J. Bair re insurance strategy re mediation and review correspondence with the Committee re upcoming mediation (.2);	0.20	\$224.00
8/25/2025	Timothy Burns	Participate in call with the mediators and Committee professionals re ongoing negotiations and preparations for next session (.5);	0.50	\$560.00
8/25/2025	Jesse Bair	Participate in call with the mediators re ongoing negotiations and upcoming session (.5);	0.50	\$450.00
8/25/2025	Jesse Bair	Review correspondence with Committee professionals and the Committee re mediation developments and conference with T. Burns re same and insurance strategy (.2);	0.20	\$180.00
8/26/2025	Brian Cawley	Begin legal research and factual analysis in connection with responding to the insurers' lift stay objections (1.3);	1.30	\$715.00
8/26/2025	Jesse Bair	Continue analyzing the insurers' lift stay objection and draft outline re insurance-related responses to same (1.2);	1.20	\$1,080.00
8/26/2025	Jesse Bair	Participate in call with Committee professionals re lift stay reply brief strategy (.5);	0.50	\$450.00
8/26/2025	Brian Cawley	Respond to T. Burns request regarding debtor's motion to approve compromise (.2);	0.20	\$110.00

8/26/2025	Timothy Burns	Review and analysis of insurers' lift stay objection, including memo to file re same (1.1);	1.10	\$1,232.00
8/26/2025	Timothy Burns	Participate in conference with Committee professionals re the insurers' lift stay objection and reply to same (.5);	0.50	\$560.00
8/26/2025	Timothy Burns	Correspondence with Committee counsel re lift stay briefing (.4); correspondence with Debtor's counsel re same (.1);	0.50	\$560.00
8/27/2025	Timothy Burns	Review recent bankruptcy court decision re insurance issues relating to potential plan structures (.2);	0.20	\$224.00
8/27/2025	Jesse Bair	Participate in call with the mediators re Diocese counter, ongoing negotiations, and upcoming session (.5); participate in follow-up call with Committee professionals re same and potential response (.3);	0.80	\$720.00
8/27/2025	Jesse Bair	Review and edit draft insurance section of the Committee's reply to the insurers' lift stay opposition (1.6);	1.60	\$1,440.00
8/27/2025	Timothy Burns	Review and respond to internal correspondence and correspondence with PSZJ re lift stay briefing (.2);	0.20	\$224.00
8/27/2025	Brian Cawley	Participate in call with mediators regarding ongoing negotiations (.5);	0.50	\$275.00
8/27/2025	Brian Cawley	Participate in call with Committee professionals re outcome of mediator meeting and next-steps in connection with same (.3);	0.30	\$165.00
8/27/2025	Brian Cawley	Draft insurance-related portions of the Committee's reply to the Insurers' lift stay objections (3.8);	3.80	\$2,090.00
8/28/2025	Timothy Burns	Review and respond to correspondence from Debtor re mediation (.2);	0.20	\$224.00
8/28/2025	Timothy Burns	Review and revise lift stay reply brief (.4);	0.40	\$448.00
8/28/2025	Jesse Bair	Review and edit revised draft of the Committee's reply in support of lift stay stipulation (.3);	0.30	\$270.00
8/28/2025	Jesse Bair	Participate in call with state court counsel re mediation strategy and upcoming session (.2);	0.20	\$180.00
8/28/2025	Jesse Bair	Review the debtor's reply brief in support of the lift stay stipulation and supporting exhibits (.3);	0.30	\$270.00
8/29/2025	Jesse Bair	Review and respond to correspondence with Committee professionals and state court counsel re insurance lift stay issues and upcoming mediation session (.2);	0.20	\$180.00
8/29/2025	Timothy Burns	Review correspondence with state court counsel and Committee professionals re JCCP proceeding (.2);	0.20	\$224.00
8/31/2025	Jesse Bair	Review the debtor's status conference statement (.1);	0.10	\$90.00
Totals for Insurance Recovery Activities			55.30	\$42,888.00

Total Hours and Fees

Case: 23-30564

Doc# 1366

Filed: 09/30/25

Entered: 09/30/25 12:32:37

72.60

\$56,671.00

Timekeeper Summary

<u>Name</u>	<u>Title</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Brian Cawley	Associate	36.30	\$550.00	\$19,965.00
Jesse Bair	Partner	17.60	\$900.00	\$15,840.00
Karen Dempski	Paralegal	0.10	\$340.00	\$34.00
Timothy Burns	Partner	18.60	\$1,120.00	\$20,832.00

Total Due This Invoice: \$56,671.00

1 Timothy W. Burns (admitted *pro hac vice*)
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3 Jesse J. Bair (admitted *pro hac vice*)
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11 *Special Insurance Counsel to The Official Committee of Unsecured Creditors*

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**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

10 In re
11 THE ROMAN CATHOLIC ARCHBISHOP
12 OF SAN FRANCISCO,
13 Debtor and Debtor in Possession.

Case No. 23-30564

Chapter 11

CERTIFICATE OF SERVICE

14 I, Brenda Horn-Edwards, declare that I am employed in the County of Dane, State of
15 Wisconsin. I am over the age of 18 and not a party to the within action. My business address is 10
16 E. Doty Street, Suite 600, Madison, Wisconsin 53703.

17 On September 30, 2025, I served a true and correct copy of the **Monthly Professional Fee
18 Statement for Burns Bair LLP for August 2025** in the manner stated below:

<input checked="" type="checkbox"/>	TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF): Pursuant to controlling General Orders and LBR, the foregoing document was served by the court via NEF and hyperlink to the document. On September 30, 2025 , I checked the CM/ECF docket for this bankruptcy case or adversary proceeding and determined that the participants on the attached Electronic Mail Notice List will receive NEF transmission at the email address stated.
<input checked="" type="checkbox"/>	(BY MAIL) I am readily familiar with the firm's practice of collection and processing correspondence for mailing. Under that practice it would be deposited with the U.S. Postal Service on that same day with postage thereon fully prepaid in Dane County, Wisconsin, in the ordinary course of business.
<input checked="" type="checkbox"/>	The Honorable Dennis Montali United States Bankruptcy Court Northern District of California 450 Golden Gate Avenue, 16 th Floor San Francisco, CA 94102



(BY EMAIL) I caused to be served the above-described document by email to the parties indicated on the attached Service List at the email address stated.

I declare, under penalty of perjury, that the foregoing is true and correct. Executed on
September 30, 2025, at Madison, Wisconsin.

/s/ Brenda Horn-Edwards
Brenda Horn-Edwards

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ELECTRONIC MAIL NOTICE LIST

Mary Alexander on behalf of Creditor Daniel Eichhorn
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John Grossbart on behalf of Interested Party St. Paul Fire and Marine Insurance Co.
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Joshua K Haevernick on behalf of Interested Party St. Paul Fire and Marine Insurance Co.
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Todd C. Jacobs on behalf of Interested Party Appalachian Insurance Company
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Daniel James on behalf of Interested Party Certain Underwriters at Lloyds London and Certain London Market Companies
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Christopher D. Johnson on behalf of Interested Party The Archdiocese of San Francisco Capital Asset Support Corporation
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Jeannie Kim on behalf of Debtor The Roman Catholic Archbishop of San Francisco
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Jennifer R Liakos on behalf of Interested Party LL John Doe JU
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Christina Marie Lincoln on behalf of Interested Party Appalachian Insurance Company
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Lisa Arlyn Linsky on behalf of Interested Party Sacred Heart Cathedral Preparatory
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Patrick Maxcy on behalf of Interested Party St. Paul Fire and Marine Insurance Co.
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